

ALSTON & BIRD L.L.P.

One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424

404-881-7000
Fax: 404-881-7777
www.alston.com

Geoffrey C. Rathgeber

Direct Dial: 404-881-4974

Email: geoff.rathgeber@alston.com

May 27, 2014

VIA EMAIL: R5FOIA@EPA.GOV

Freedom of Information Officer
U.S. EPA Region 5 (MI-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Freedom of Information Act Request

Dear Sir/Madam:

Pursuant to the Freedom of Information Act (5 U.S.C. § 552), I request copies of the following records:

1. Any written communications relating to offers of settlement for the RRG/Clayton Chemical Superfund Site (the "Site") and made by Pharmacia LLC and Solutia, Inc. to any of the 83 third-party defendants identified in the first paragraph of Attachment A.
2. Any written communications relating to offers of settlement for the Site and made by Pharmacia LLC and Solutia, Inc. to any potentially responsible parties (not identified in Attachment A) concerning cleanup costs associated with the Site.

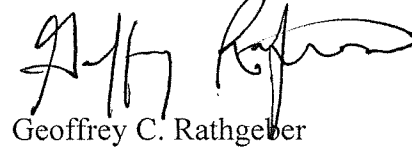
These requests include copies of any and all documents, correspondence, memoranda, letters, offers, agreements, and other records that have been received or maintained by US EPA Region 5.

I authorize the expenditure of up to \$300 to gather and transmit all responsive documents and things pursuant to this request. Please contact me if fees and costs will exceed this sum. Please send the requested information at your earliest convenience to the undersigned at the One Atlantic Center address noted above. I may be reached at (404) 881-4974 or geoff.rathgeber@alston.com. I would prefer to receive all responsive documents as PDFs on a CD. To the extent anything is withheld, please provide a list identifying those materials.

Thank you for your prompt assistance in responding to this request.

Sincerely,

ALSTON & BIRD LLP

A handwritten signature in black ink, appearing to read "G. Rathgeber", is written over the printed name.

Geoffrey C. Rathgeber

Attachment

cc: Douglas S. Arnold

LEGAL02/34868148v1

Attachment A

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 3:13-CV-00138-JPG-PMF
)	
PHARMACIA LLC, (formerly known as)	
MONSANTO CO.) and SOLUTIA, INC.,)	
)	
Defendants/Third-Party Plaintiffs,)	
)	
v.)	
)	
Actuant Corporation, et al.,)	
)	
Third-Party Defendants.)	

FIRST JOINT MOTION OF THIRD-PARTY PLAINTIFFS AND CERTAIN THIRD-PARTY DEFENDANTS TO APPROVE SETTLEMENT, DISMISS PURSUANT TO SETTLEMENT AGREEMENT, AND GRANT CONTRIBUTION PROTECTION

Defendants and Third-Party Plaintiffs Pharmacia LLC ("Pharmacia") and Solutia Inc. ("Solutia") (collectively "Settling Plaintiffs") and Third-Parties Actuant Corporation; Alco Industries, Inc.; Arris International, Inc.; Asbury Automotive St. Louis, L.L.C. d/b/a Plaza Motor Co.; Associated Electric Cooperative, Inc.; Bachman Machine Company; Baker Hughes Incorporated; Baldor Electric Company, BBB Inc.; Basler Electric Company; The Boeing Company; Brasch Manufacturing Co., Inc.; Bridgestone Americas Tire Operations, LLC; Brown Paper Goods Company; Chemisphere Corporation; Chevron Chemical Company, a division of Chevron U.S.A. Inc.; Chicago Drum, Inc.; CMC Bridgeview, Inc.; Crane Company; C. R. Metal Products, Inc.; Deluxe Corporation; DJR Holdings; Dorma USA Inc.; The Dow Chemical Company; EMCO Chemical Distributors, Inc.; Etnyre International, LTD; Ford Motor Company; Gardner Denver, Inc.; The Grigoleit Company; Group O, Inc.; Hartley Marine LLC (f/k/a Hartley Marine Corp. d/b/a Walker

MidstreamFuel and Supply) and related entity Walker Paducah Corp.; Heritage Environmental Services Inc.; Hunter Engineering Company; Independent Concrete Pipe, Co.; Interlake Mecalux, Inc.; INX International Ink Co., *f/k/a* Acme Printing Ink Company; J.D. Streett and Company, Inc.; The Knapheide Manufacturing Company; KV Pharmaceutical Company; LHB Industries, Inc.; Lincoln Industrial Corporation; M & M Service Company; Magna Visual, Inc.; Martin Engineering Company; Masterchem Brands, Inc.; MeadWestvaco Consumer Packaging Group, LLC; Merck Sharp & Dohme Corp.; Mervis Industries, Inc.; Metalico-Granite City, Inc.; Mid-America Protective Coatings, Inc.; Mid-States Paint & Chemical Company; Missouri Department of Transportation; Mitsubishi Motors North America, Inc.; Nascote Industries, Inc.; Nashua Corporation; National Coatings Inc.; Nordyne LLC; Norfolk Southern Railway Company; North American Lighting, Inc.; Park Corporation; Penn Aluminum International, Inc.; PerkinElmer, Inc.; Perma-Fix Environmental Services, Inc.; The Premcor Refining Group, Inc.; Quaker Chemical Corporation; Regal-Beloit Corporation; Rexam Beverage Can Company; Rhodia, Inc., a member of the Solvay Group; Sinclair & Rush, Inc.; Standardaero Business Aviation Services, LLC; Superior Oil Company, Inc.; Swan Corporation; Teva Pharmaceutical USA, Inc.; Texas Eastern Transmission, LP; Titan International, Inc.; Titan Tube Fabricators, Inc.; Tnemec Company, Inc.; True Manufacturing Co., Inc.; Universal Printing Company; US Paint Corporation; US Tape & Label Corporation; Valentec Wells, LLC; Whirlpool Corporation; and Williams Patent Crusher and Pulverizer Company, (collectively "Settling Defendants"), hereby jointly request that this Court enter an Order substantially the same as this Court's prior Order in *United States v. Pharmacia Corporation, et al*, Case No. 99-cv-63-GPM-PMF, Docs. 556, 625, and 654 (Order); 725; 726; 727; 734 and 737 (Order):